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Attorneys for United States of America

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

TOM GONZALES, as Personal Representative for the Estate of Thomas J. Gonzales, II,

Plaintiff,

VS.

UNITED STATES OF AMERICA,

Defendant.

Case No. C-08-3189-JL

**STIPULATION TO EXTEND TIME FOR
UNITED STATES TO RESPOND TO
THE COMPLAINT AND CONTINUE INITIAL
CASE MANAGEMENT CONFERENCE AND
[proposed] ORDER**

It is hereby stipulated by and between plaintiff Tom Gonzales, as the Personal Representative for the Estate of Thomas J. Gonzales, II, and defendant United States of America, by and through their respective counsel, that the United States be granted an extension of time for forty-five (45) days, up to and including October 17, 2008, within which to file a response to the complaint, and that the Initial Case Management Conference set for October 8, 2008, at 10:30 a.m., be continued for a corresponding period of forty-five (45) days or such later time as may be necessary for the convenience of the Court. This continuance will allow the United States the additional time it needs to obtain and thoroughly

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1 review the administrative materials from the Internal Revenue Service.

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3 Martin A. Schainbaum
A Professional Law Corporation

JOSEPH P. RUSSONIELLO
United States Attorney

4
5 By: /S/ Martin A. Schainbaum
MARTIN A. SCHAINBAUM

/S/ Amy Matchison
AMY MATCHISON
United States Department of Justice,
Tax Division

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7 Attorney for Plaintiff

Attorneys for Defendant

8
9 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
10 "conformed" signature (/S/) within this efiled document.

11 /S/ Amy Matchison
AMY MATCHISON
12 Trial Attorney, Tax Division
13 U.S. Department of Justice

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15
16 Dated: _____

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing **STIPULATION TO EXTEND TIME FOR UNITED STATES TO RESPOND TO THE COMPLAINT AND TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE and [proposed] ORDER** has been made this 26th day of August, 2008 via the Court's CM/ECF system to:

Martin A. Schainbaum, Esq.

schainbm@taxwarrior.com

/S/ Amy Matchison
AMY MATCHISON
Trial Attorney, Tax Division
U.S. Department of Justice